

**SUMMARY OF THE  
ACCREDITING AUTHORITY COMMITTEE MEETING  
DECEMBER 15, 1999**

The Accrediting Authority Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met on Wednesday, December 15, 1999, at 8 a.m. Eastern Standard Time (EST) as part of the Fifth NELAC Interim Meeting (NELAC Vi) in Washington, DC. The meeting was led by its chair, Mr. John P. Anderson of the Illinois Environmental Protection Agency, Division of Laboratories. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss the issues contained in the committee's published agenda and to entertain open discussion related to the committee's duties and activities.*

**INTRODUCTION**

Mr. Anderson introduced himself, then asked committee members to introduce themselves and to relate their history of involvement with the committee and with NELAC. He reminded participants that several current committee members will soon complete their appointments and encouraged participants to consider nominating appropriate individuals (or themselves). Mr. Anderson then reviewed the "ground rules" that would be in effect for the meeting discussions.

**AGENDA ITEMS**

Mr. Anderson initiated discussion of agenda items, in the order of their listing below.

**Proposed Revision to the Accrediting Authority Review Board (AARB) Appointment Process, and Clarification of AARB Duties**

The discussions of the Program Policy and Structure meeting at NELAC Vi held on December 14, 1999, concerning reciprocity and the lack of trust on the part of some states regarding reciprocity were reviewed. An examination of International Standards Organization (ISO) guides had previously identified that guidance exists for overall review of governing bodies in accreditation programs. It was agreed that the AARB should be a review board of unimpeachable members whose role is to provide oversight review of the National Environmental Laboratory Accreditation Program's (NELAP) structure and operations. The committee reviewed changes to Section 1.6.3. regarding the AARB, as proposed during the NELAC Vi meeting of the Program Policy and Structure Committee. Discussion was heard regarding a proposal to ban non-voting member representation on the AARB. There was broad attendee support for private-sector representation, and a request was made that the committee readdress the advantages and disadvantages of such representation. It was stated that no federal agencies have applied for recognition as accrediting authorities. In lieu of specific private-sector representation, it was suggested that the Environmental Laboratory Advisory Board (ELAB) might recommend AARB members without specifically prohibiting private-sector members, or that additional representation might come from NELAC. It was suggested that the duties and responsibilities of the AARB be more clearly defined.

## **Applicability of ISO Guides 61 and/or 62 to NELAP**

Mr. Anderson opened discussion regarding the applicability of ISO guides to the structure and operation of NELAP. This issue is important in the context of future recognition of NELAP by the international laboratory accreditation community. Committee members reviewed the current two-tiered NELAP review process, that of accrediting authority review of laboratories and NELAP review of accrediting authorities. The concern is that, in order to be consistent with current ISO guides, a review process for the entire NELAP there must exist. A review of committee and participant understanding of current ISO guides identified ISO Guide 25 to cover laboratory quality systems, ISO Guide 58 to provide guidance to accrediting authorities as they review each other in the context of reciprocity issues, and ISO Guides 61 and 62 to cover quality systems for approval bodies (e.g., U.S. Environmental Protection Agency [USEPA]). It was agreed that an independent board for review of NELAP is essential, but it was unclear which ISO guide provides the most relevant information. It was recommended that the Committee look to the provisions of the National Conference on Laboratory Accreditation (NACLA) and other similar programs as models. Committee members and participants were reminded that the International Laboratory Accreditation Cooperative (ILAC) meeting, to be held in Washington, DC in October 2000, might provide pertinent discussion. A participant commented that ILAC in particular and the international community in general look for a solid appeals process, and queried whether an appropriate process exists within NELAP.

## **OPEN DISCUSSION**

The first issue stemmed from earlier discussions held by the Regional Lead Assessors. They proposed that federal government agencies that are accrediting authorities only be allowed to review government or state laboratories. The concern is that private sector laboratories will inundate the USEPA with requests for review and that they simply won't have the necessary resources. However, a government laboratory should be allowed to engage any accrediting authority for its review. There was discussion as to whether the wording of Section 6.2.2.d of the NELAC Standards already addresses this issue, or whether it only covers government laboratories with conflicts of interest. It was suggested that USEPA simply make known its own policy regarding this issue and that the NELAC Standards not be amended. A question was raised as to whether USEPA will have the budgetary resources to review any and all state laboratories. Current thinking is that USEPA will be able to accredit at least one government laboratory per state. The committee requested that Mr. Gary Bennett of USEPA Region IV draft pertinent language regarding the USEPA's proposal for limiting the range of laboratories that may seek accreditation from federal accrediting authorities. It was suggested that USEPA's ability and interest in supporting NELAP is a decision of each USEPA office. A participant noted that, under ILAC guidelines, an accrediting authority must have "financial where-with-all."

### **Section 1.5.3**

Regarding Section 1.5.3 on reciprocity, Ms. Jackie Sample of the Department of Defense (DOD) offered to provide a copy of a proposed new Section 1.5.3.1 regarding federal agencies accrediting private sector laboratories. This was developed from discussions held by the Program Policy and Structure Committee at their NELAC Vi meeting on Tuesday, December 14, 1999.

### **Section 6.3.3.a**

A question was raised regarding Section 6.3.3.a , and whether the technical review referenced therein is to be completed, or simply begun, within the 30 days stated. It was agreed by participants that their interpretation is that the review would be completed.

### **Section 6.3.4.a.3**

A question was raised regarding Section 6.3.4.a.3, where there was a suggestion to strike the phrase “guidance documents and standard operating procedures” because retaining such wording implies that the accredited entity would have to notify its accrediting authority of each and every change that occurs in its laboratory operations, quality system, and documentation. It was decided that the wording not be amended, but that any accredited entity use a “common sense approach” regarding changes of which it notifies its accrediting authority.

### **Section 6.4.2.c**

A question was raised regarding Section 6.4.2.c, and whether allowing review of “all records” is inappropriate in cases where enforcement-confidential documents may exist. After much discussion, it was agreed that the committee should research for “need-to-know” wording in other similar federal programs. Ms. Anne-Marie Allen of the Commonwealth of Massachusetts agreed to draft wording for discussion in future committee meetings.

Current wording of Section 6.5.a allows for a two-year extension for correction of deficiencies by accrediting authorities that have applied for NELAP recognition by July 1, 2000. Considerable discussion was heard as to whether this is discouraging for states that may apply after the July 2000 date to be an accrediting authority. It was acknowledged that the current wording was designed with the initial group of accrediting authorities in mind. The committee agreed to revisit the wording of this section and possibly strike the July 2000 reference but leaving the two-year grace period for any state applying for accrediting authority recognition in the future.

### **Assignments in Preparation for NELAC VI**

Assignments in preparation for NELAC VI were not made as a part of the convened committee meeting, but will be made by Mr. Anderson in the immediate near-term as a result of discussions and proposals made in this committee meeting.

**ACTION ITEMS  
ACCREDITING AUTHORITY COMMITTEE MEETING  
DECEMBER 15, 1999**

<b>Item No.</b>	<b>Action</b>	<b>Date to be Completed</b>
1.	Schedule a meeting by teleconference with the Program Policy and Structure Committee to discuss unresolved issues.	1/15/00
2.	Gary Bennett of USEPA Region IV will draft language regarding USEPA's policy on accrediting government (state) and non-government laboratories.	2/1/00
3.	Jackie Sample will prepare language for Section 1.5.3.1. of the NELAC Standards.	2/1/00
4.	Anne-Marie Allen will draft discussion material regarding Section 6.4.2.c of the NELAC Standards as it relates to review of enforcement-confidential documents.	2/1/00
5.	Continue consideration of AARB appointment process and clarification of AARB duties.	2/29/00
6.	Schedule a meeting by teleconference with the Program Policy and Structure Committee to discuss AARB issues.	2/29/00
7.	Seek information from ISO Guides, NACLA, ILAC and other programs regarding issues relevant to oversight of NELAP.	3/1/00
8.	Review Section 6.5.a. of the NELAC Standards regarding possible indefinite extension of the two-year grace period for accrediting authorities to remove deficiencies.	4/15/00

**PARTICIPANTS  
ACCREDITING AUTHORITY COMMITTEE MEETING  
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